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Attorneys for Defendant
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23CR228-DJC
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) JUDGMENT AND SENTENCING
EDGAR ENRIQUE GARCIA-LOPEZ,) Date: September 11, 2025
) Time: 9:00 a.m.
) Judge: Hon. Daniel J. Calabretta
<u>Defendant.</u>)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Eric Grant, through Assistant United States Attorney Jason Hitt, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the previously scheduled Judgment and Sentencing set for September 11, 2025 be continued to November 6, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

1. In June and late July 2025, the government produced to Mr. Garcia a cellular phone extraction of his personal phone and ping data also related to the phone. They are potentially relevant to PSR objections.
2. Good cause and compelling circumstances exist to continue the Judgment and Sentencing Mr. Garcia was not able to complete review of the material in order to timely file formal objections that were due August 28, 2025. The celebrite file is

large and the ping data is also significant in size. He respectfully requests additional time to complete the task at hand.

3. The government does not object to Mr. Garcia's continuance request.

4. The parties jointly request that the Judgment and Sentencing Schedule be modified as follows.

Draft PSR	completed
Informal Objections	completed
Final PSR	completed
Formal Objections	October 23, 2025
Response to Formal Objections/Sentencing Memorandum	October 30, 2025
Judgment and Sentencing	November 6, 2025

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: September 3, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Garcia

Date: September 3, 2025

ERIC GRANT
United States Attorney

/s/ Jason Hitt
JASON HITT
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulated dates listed above; however, the parties shall appear for a Status Conference re Sentencing on September 11, 2025, at 9:00 AM, in Courtroom 7 before District Judge Daniel J. Calabretta

IT IS SO ORDERED.

Dated: September 5, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE